

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MARY E. SHEPARD and the ILLINOIS )  
STATE RIFLE ASSOCIATION, )

Plaintiffs, )

-vs- )

No. 11-405

LISA M. MADIGAN, solely in her official )  
capacity as ATTORNEY GENERAL OF )  
ILLINOIS, GOVERNOR PATRICK J. )  
QUINN, solely in his official capacity as )  
Governor of the State of Illinois, )  
TYLER R. EDMONDS, solely in his )  
official capacity as the State's Attorney )  
of Union County, Illinois, and SHERIFF )  
DAVID LIVESAY, solely in his official )  
capacity as Sheriff of Union County, )

Defendants. )

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO FEE PETITION AND BILL OF COSTS**

COME NOW the defendants, Lisa Madigan, in her official capacity as Attorney General of the State of Illinois, Governor Patrick Quinn, and Tyler R. Edmonds, by and through their counsel, LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, request an extension of time, up to and including April 15, 2014, to respond to the fee petition filed by plaintiff's attorneys and the bill of costs. In support thereof, the following statements are made.

1. Plaintiffs filed a motion for attorneys' fees in excess of \$627,000; expenses in excess of \$12,000; and costs of nearly \$800 on December 27, 2013 [Doc. 106,107].
2. On January 6, 2014, defendants requested an extension of time to respond to the plaintiffs' motion for attorneys' fees. [Doc. 108]

3. On January 10, 2014, this Court granted defendants' motion for extension of time [Doc. 117].

4. The parties are currently working on resolving a discovery dispute and discussing settlement.

5. This motion is not made for the purpose of delay, but is made to adequately defend the fee petition and bill of costs.

6. Plaintiffs' counsel has indicated that they have no objection to a three week extension of time to attempt to resolve any discovery disputes and for defendants to file a response to the petition for fees.

WHEREFORE for the above and foregoing reasons, defendants, Lisa Madigan, in her official capacity as Attorney General of the State of Illinois, Governor Patrick Quinn, and Tyler R. Edmonds, respectfully request this honorable Court to grant them up to and including, April 15, 2014, to respond to the fee petition filed by plaintiffs' attorneys and the bill of costs.

Respectfully submitted,

LISA MADIGAN, PATRICK QUINN, and TYLER  
R. EDMONDS,

Defendants,

LISA MADIGAN, Attorney General,  
State of Illinois,

Attorney for Defendants.

By: /s/Karen L. McNaught  
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official capacity as the State's Attorney  
of Union County, Illinois, and SHERIFF  
DAVID LIVESAY, solely in his official  
capacity as Sheriff of Union County,

Defendants.

**Certificate of Service**

I hereby certify that on March 14, 2014, I electronically filed Motion for Extension  
of Time with the Clerk of Court using the CM/ECF system which will send notification of  
such filing to the following:

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and I hereby certify that on March 14, 2014, I mailed by United States Postal Service, the document to the following non-registered participant:

None

Respectfully submitted,

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